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State Ethics Commission

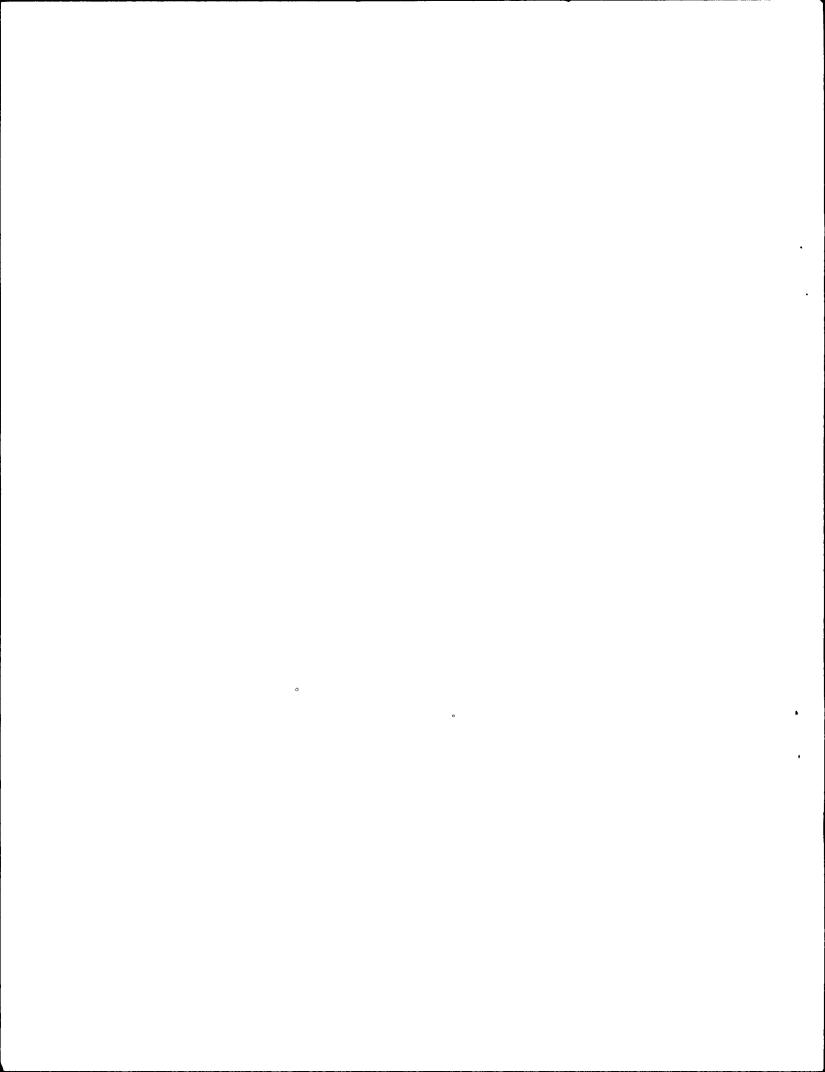
ANNUAL REPORT 1999



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MARYLAND STREE ARCHIVES





PARRIS N. GLENDENING GOVERNOR

COMMISSION MEMBERS: CHARLES O. MONK. II, Chairman DOROTHY R. FAIT MICHAEL L. MAY D. BRUCE POOLE APRIL E. SEPULVEDA

STATE ETHICS COMMISSION

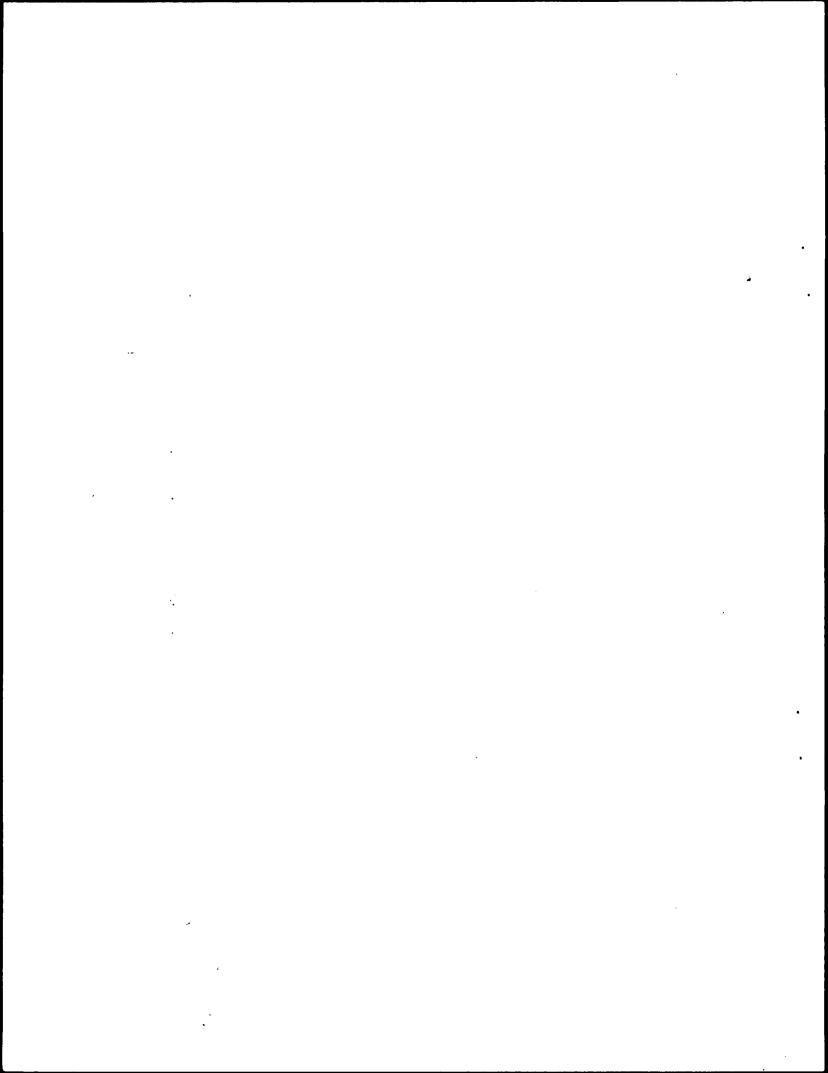
300 E. JOPPA ROAD, SUITE 301 TOWSON, MARYLAND 21286 410-321-3636 / 1-877-669-6085 Annapolis Legislative Office

Annapolis Legislative Office Room 432, Goldstein Treasury Building 410-974-2068 JOHN E. O'DONNELL Executive Director NANCY L. SPECK General Counsel ROBERT A. HAHN Staff Counsel

MARYLAND STATE ETHICS COMMISSION

TWENTY-FIRST ANNUAL REPORT

January 1, 1999 - December 31, 1999



STATE ETHICS COMMISSION

January 1, 1999 - December 31, 1999

Twenty-First Annual Report

GENERAL STATUTORY IMPLEMENTATION

The State Ethics Commission met 9 times during Calendar Year 1999 and was involved in program activity relating to all areas of its statutory mandate. These general activities covered financial disclosure, conflict of interest, lobbyist disclosure and conduct restrictions, local government ethics laws, school board ethics regulations, advisory opinions, enforcement matters, employee education, and public information activities.

A substantial Commission and staff activity involved implementing new legislation which required substantial changes in forms and informational materials. The Commission was also involved in making legislative recommendations to legislative committees and the Executive Branch. Part of this activity included a study of proposed new procurement ethics legislation. One member of the Commission and the Commission staff were extensively involved in a comprehensive study of the Maryland Lobbying Law initiated by the General Assembly in 1999.

One concern which impacted on staff operations during 1999 was a legislative mandate for the Commission to move to Annapolis. This caused staff turnover and other operational disruptions which impacted on the operation of the financial disclosure program and other activities. Although the Commission was advised by the State that no space was available and announced plans to have an Annapolis branch office in the year 2000, this issue and potential further disruptions caused by resulting turnover may continue to be a concern.

The State Ethics Commission received an award from Common Cause/Maryland in 1999 for its work in carrying out the ethics program for Maryland citizens.

Issuance of Advisory Opinions

The Commission issues advisory opinions in response to requests from officials, employees, lobbyists, and others who are subject to the Ethics Law. Additionally, the Commission may issue advisory opinions to other persons at its discretion. During Calendar Year 1999, the Commission issued 8 formal published opinions. Many of the formal opinions considered in 1999 primarily dealt with the employment prohibitions of the Ethics Law. Other issues considered included procurement, ownership interests, part-time commission member conflicts or exemptions and post-employment. One factor reducing the need for formal opinions issued by the Commission is the large number of existing opinions that can now be used for fast informal guidance. The Commission staff was able to provide informal

guidance in 1295 potential formal request situations based on existing opinions of the Commission. The Commission itself provided informal advice in lieu of formal opinion guidance, usually in the form of a letter, in 116 situations during the year. Informal guidance covered nearly all aspects of the Ethics Law. Many advice inquiries were in part caused by State employee salary support limitations in State government which have resulted in a substantial number of secondary employment questions. The combined total number of advice situations (formal, Commission informal, and staff informal) increased by 18 during 1999. This is the seventh consecutive year of an increase in the combined totals of advice activity. The total for 1999 was 1,411 compared to 411 in 1986. The Commission began keeping statistics on this combined activity in 1986.

Another part of the advice process is to consider various exemption programs enacted as part of the Ethics Law. The Commission approved a few exemptions and reviewed and commented on sponsored research exemption reports and procedures administered by colleges and universities.

Financial Disclosure

The administration of the financial disclosure program continued to involve the identification of those required to file, providing technical assistance to filers, and monitoring compliance with the Law. The Commission was involved in reviewing a large number of requests by various agencies to add or delete positions from the financial disclosure filing list. Action on these requests, which is part of the agenda at nearly all Commission meetings, has increased the list of filers. The Commission also reviewed the Ethics Law status of new boards and commissions and considered and acted upon requests by advisory boards to be exempted from the requirement to file financial disclosure statements. This activity has significantly increased in recent years due to a substantial increase in the number of boards and commissions being created by the General Assembly. Compliance review of forms is conducted as part of a phased program for review of the forms of officials and employees. Currently there are over 8,000 persons filing financial disclosure forms and this number continues to grow. Boards and Commissions are currently required to file a limited form of financial disclosure. In addition, copies of all judicial official financial disclosure forms are also filed at the Commission office. As part of the review program, letters are sent to some filers regarding the need to provide further information in order to meet filing requirements. Conflict of interest monitoring is also part of this process. The Commission was unable to strengthen its financial disclosure review program in 1999 due to staff turnover in those positions having primary responsibility for financial disclosure activities.

In addition to the regular financial disclosure program, a very substantial number of appointees to executive boards or commissions seeking limited conflict of interest exemptions from the appointing authority, must file a form publicly disclosing areas of existing conflicts with the Commission, the appointing authority and the Senate where applicable. The Commission staff coordinated the filing of these forms with the appointing authority, reviewed the forms and assisted a large number of appointees throughout the year to complete these disclosures.

Changes in law, effective October 1, 1999, required revised financial disclosure forms. A new preliminary financial disclosure form was developed in conjunction with the Joint Committee on Legislative Ethics for filing by members of the General Assembly having substantial change from the previous year's filing.

Lobbyist Disclosure and Regulation

During the lobbying year which ended on October 31, 1999, 2,008 lobbying registrations were filed with the Commission. This represents an increase from the 1,929 registrations filed in 1998. The 2,008 registrations were filed by 602 different lobbyists on behalf of 864 separate employers. (Some employers have more than one lobbyist and many lobbyists have more than one employer.) This compares to 905 employers having one or more registrants in the previous year and 571 individual lobbyists in the prior year. The program has grown very substantially since 1979, the year when the program was taken over from the Secretary of State. The totals for registrations is the highest in the history of the program. However, the reduction in the number of employers is unusual. The growth in the number of lobbyists had been far slower than the growth in registrations, employers and expenditures. For example, in 1988 there were 415 registered lobbyists, 545 employers and 744 registrations spending \$9,405,759. This data reflects a trend of a growing lobbying business being concentrated within a smaller group of lobbyist and firms. Although the largest number of lobbyists are registered during the legislative session, registrations are beginning and ending throughout the lobbying year, which begins on November 1 and ends on October 31 of the following year. Most persons registered to lobby have a single registration representing one employer, however, 113 lobbyists had two or more registrations during this time period, 65 registrants had four or more employers, and 46 lobbyists had eight or more employers. The Ethics Commission monitors lobbyist registration and reporting and other parts of the lobbying law covering gifts, contingent fees, and campaign finance activity.

The \$23,465,383 in lobbying expenditures reported for the period of October 31, 1999, represents an increase of \$594,795 over the previous year. This is the largest dollar amount reported in program history but a substantially smaller increase than occurred in 1998. Lobbying expenditures have very significantly increased since the Commission compiled \$2,864,454 of expenditures in 1979, the first year the Ethics Commission administered the filing program. Expenditures for gifts and entertainment in 1999 increased from \$657,192 to \$757,356. The total for gifts and entertainment was substantially below the record level of \$824,685 reported in 1993 but is far above the \$213,385 reported in 1980. The amount for food and beverages other than special events decreased from \$57,358 to \$28,596. The amount in this category was dramatically lower than the \$416,924 reported in this category for 1992. This decrease appears to reflect mostly stronger disclosure laws in recent years and an increasing reluctance of officials to accept this type of entertainment. The amount spent for special events also increased from \$504,818 in 1998 to \$684,958 in 1999. This is substantially above the \$245,288 reported for these types of events in 1994. Under current law, special events include events to which all members of the General Assembly, either house, a standing committee, or geographic delegation is invited. The expansion of no recipient disclosure to geographic committees and the very small size of some of these groupings is likely to increase the volume of this type of entertainment. This is particularly true with the new restrictions on meals and beverages for non-group events enacted in 1999 to be effective on October 1, 1999. There were 54 all-members events reported in 1999 totaling \$548,905. Not all of these funds were spent on General Assembly members because the cost for attendance of event sponsors, lobbyists, and others is sometimes reported in the event total cost. There were 60 events reported for House of Delegates Standing Committees and 45 for Senate Standing Committees. The total of 105 events was higher than the 89 events in 1998 but was below the 116 reported in 1996. The most entertained committees in the House of Delegates were the Environmental Matters Committee and the Economic Matters Committee with 17 events. The least entertained Standing Committees in the House was the Commerce and Government Matters Committee with 2 events. In the Senate, the least entertained committee was the Judicial Proceedings Committee with 8 events. The most events reported in the Senate were for the Finance

Committee with 18 events. The regional delegation with the most events reported was the Montgomery County Delegation with 8 events.

A detailed analysis of special events spending is contained in Appendix C of this report. Lobbyists are also required to file gift reports naming individuals receiving meals, tickets or other gifts above certain thresholds. Fifty-two lobbyists filed 102 gift reports in 1999 compared to 142 in 1998. Gift reports may name one or more gift recipients. Gift reports tend to be concentrated among the higher spending employers. There were 36 special gift reports filed on behalf of the top 120 employers ranked by total lobbyist expenditures. The next 120 in that ranking only filed 20 special gift reports. In view of new gift limitations effective October 1, 1999, and the fact that gift reports are no longer required in some situations, the volume of gift reports is likely to decline further next year.

An analysis of individual reports indicates that 116 lobbyist employers reported having total lobbying expenditures of \$50,000 or more. There were 273 lobbyist employers reporting total expenditures of \$25,000 or more. This compares to 243 employers reaching this total in 1998. Reports of individual lobbyists registered on behalf of one or more employers indicate that 79 reported \$50,000 or more in compensation for services. Forty-five lobbyists reported compensation of \$100,000 or more. One reported over \$1,000,000 in lobbying fees. Total lobbyist compensation increased from \$17,262,525 in 1998 to \$18,320,596 in 1999. Examples of topic areas involving large total employer expenditures during the reporting period included business, utilities, racing, labor, health, banking, tobacco, communications, technology, attorneys, real estate, construction and insurance. Employer lobbying spending continues to increase significantly. In 1988, only 5 employers spent over \$100,000 on lobbying. In 1999, 35 employers exceeded \$100,000. A list of those employers expending \$25,000 or more and those lobbyists reporting \$50,000 or more in compensation is included in Appendices A and B of this report.

The following expenditure data summarizes lobbying expenditures for the last three lobbying years:

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1.	Expenditures for meals and bever-	<u>10/31/97</u>	10/31/98	10/31/99
	ages for officials or employees or their immediate families.	\$ 58,880	\$ 57,358	\$ 28,596
2.	Expenditures for special events, including parties, dinners, athletic events, entertainment, and other functions to which all members of the General Assembly, either house thereof, or any standing committee thereof were invited. (Date, location, group benefitted, and total expense for each event are also reported.)	\$ 546,441	\$ 504,819	\$ 684,958
3.	Expenses for food, lodging, and scheduled entertainment of officials and employees and spouses for a meeting given in return	•		

8,063

\$ 80,129

. \$ 3,704

for participation in a panel or speaking engagement at the

meeting.

4.	Expenditures for gifts to or for officials or employees or their immediate families (not including sums reported in I, 2, and 3).	\$	22,159		\$14,886	\$ 40,098
	Subtotal of items I, 2, 3, & 4	<u>\$ 6</u>	<u>35,543</u>	\$	<u>657,192</u>	·
5.	Total compensation paid to registrant (not including sums reported in any other section).	\$16,7	29,154	\$17,	237,276	\$18,320,596
6.	Salaries, compensation and reimbursed expenses for staff of the registrant.	\$ 7	52,181	\$	783,605	\$ 766,802
7.	Office expenses not reported in items 5 and 6.	\$ 9	15,309	\$ 8	830,386	\$ 937,386
8.	Cost of professional and technical research and assistance not reported in items 5 and 6.	· \$ 4	61,190	\$ 7	729,941	\$ 597,500
9.	Cost of publications which expressly encourage persons to communicate with officials or employees.		60.000	•		
10		\$ 40	60,633	\$2,	160,301	\$1,499,450
10.	Fees and expenses paid to witnesses.	\$ \$	738	\$	29,540	\$ 29,265
11.	Other expenses.	\$ 3	92,697	\$ 4	142,347	\$ 557,028
	Total of items 1 through 11	\$20,34	<u>47,445</u>	<u>\$22,8</u>	370,588	<u>\$23,465,383</u>

NOTE: At the time the Annual Report was compiled, some lobbyist expenditure information was subject to adjustment based on the staff review program.

Enforcement Activities

The Ethics Law and implementing rules of the Commission provide that any person may file a complaint with the Commission. Complaints filed with the Commission must be signed, under oath, and allege a violation of the Law by a person subject to the Law. Additionally, the Commission may file a complaint on its own initiative, and it carries out preliminary inquiries of potential law violations at its discretion. Because of the limited investigative resources available to the Commission, there is some backlog of enforcement matters pending with the Commission.

In Calendar Year 1999, the Commission issued or accepted 68 complaints. Sixty-four complaints involved financial disclosure matters, 2 complaints involved lobbyist matters, 1 complaint related to conflict of interest issues, and 1 complaint related to the procurement restrictions in Section 15-508 of the Law. During this calendar year action was completed

on 77 complaints. Sixty-eight of the completed complaint matters were financial disclosure matters. Forty-two failure to timely file financial disclosure statement complaints were terminated by accepted the late filing as a cure. Twelve late financial disclosure complaints were resolved by submission of the form and acceptance of a stipulation of settlement which included an admission of late filing violation, waiver of confidentiality, acceptance of a reprimand, and the payment of funds (in lieu of late fees and fines) to the State. A total of \$4,845 was paid to the State pursuant to these agreements during 1999.

Six hearings were held during the year involving respondents who had failed to timely file the required financial disclosure statement. The Respondents appeared at four of the hearings. The hearings resulted in a finding of failure to timely file; assessed late fees in accord with Section 15-405(d)(2) of the Ethics Law; and a reprimand. Four of the complaint hearings involved current State employees. One involved an unsuccessful candidate for the House of Delegates who had failed to properly complete the financial disclosure statements required with certificate of candidacy. The last complaint hearing involved a State official who refused to file. This complaint has been referred to the Attorney General to assist in the enforcement of the Commission's order.

Three of the complaints completed during the year involved lobbyist matters. Two complaints involved fee lobbyists who had failed to timely register on behalf of an employer. In one matter, a Stipulation of Settlement was accepted which required the lobbyist to pay \$250 in late fees. A hearing was held on the second complaint with the Respondent present and resulted in a finding that the lobbyist violated Section 15-701(a) of the Ethics Law. The Commission ordered him to pay a late filing fee of \$250. The Respondent has appealed the Commission's order to the Circuit Court where it is presently pending. The Office of the Attorney General is representing the Commission in this court proceeding. The third lobbyist complaint involved a lobbyist who failed to file a lobbying activity report. It was resolved when the lobbyist submitted a lobbying activity report which indicated no lobbying activity and was accepted as a cure to the complaint.

The Commission also considered several other situations involving lobbyists who had failed to timely file either a registration or lobbying activity report. These matters resulted in agreements with lobbyists paying amounts up to \$250 per report. The Commission received a total of \$3,500 payments to the State of Maryland from 14 different lobbyists. All enforcement payments are deposited in the State's general fund and cannot be used by the Commission.

Six conflict of interest complaints were resolved during Calendar Year 1999. One complaint involved a citizen member of a State commission, where he served as the chairman, and was a public official subject to the Ethics Law. The respondent also began service on the board of directors of a non-profit organization which had begun discussions with the respondent's State commission regarding a joint venture. The complaint was resolved by a settlement agreement where the respondent admitted that his service on the board of the private entity was inconsistent with his service on the commission and his participation in discussion of joint venture matters was inconsistent with Sections 15-501 and 15-502 of the Ethics Law. The respondent also accept a reprimand which was transmitted to the appointing authority.

A second conflict of interest complaint involved a State employee who some years ago invested in a family business which in subsequent years began doing business with his agency. The matter was resolved when the respondent entered into a divesture agreement which was accepted by the Commission as a cure to the complaint. The Commission noted that the respondent agency had disciplined him.

A third complaint was dismissed after the preliminary investigation report was submitted by the Commission's Staff Counsel. Two other complaints were placed on the inactive docket and one other complaint closed because of the death of the respondent.

At the end of Calendar Year 1999, 3 complaints were pending involving conflict of interest. Additionally, there were 77 complaints involving financial disclosure and lobbyist filings pending. The total enforcement payments and late fees actually received by the Commission in 1999 was \$19,095. (This amount included payments totaling \$10,750 which had been ordered in calendar year 1998.) Finally, there remains a conflict of interest complaint from 1997 which had been appealed by the respondent to the Circuit Court and is now on appeal at the Court of Special Appeals. The matter remains pending at this time. The Commission's order in that case included payment of \$1,000 in late fees and civil fines in the amount of \$7,500. The Commission is represented in court on this matter by the Office of the Attorney General.

Local Government Ethics Laws

Maryland counties and cities are required under the Ethics Law to enact local laws similar to the State Law. In addition to the requirement that counties and cities enact ethics laws, in 1983, the General Assembly amended the Law to require local school boards either to promulgate ethics regulations similar to the State Law or be covered by county ethics laws. Most of the staff activity relating to local ethics programs during 1999 involved providing limited technical assistance to local ethics officials regarding ongoing administration of local government ethics programs. As part of its responsibilities, the Commission reviewed new or revised ethics laws for 4 localities during 1999. Some amended local laws were still under review and not approved at the end of the year. The Commission was also engaged in review of the Ethics Law status of employees of States Attorney's Offices and Sheriff's Offices. Criteria for evaluating similarity to the State Law are defined in Commission regulations. Municipalities, based on size and other factors, may be exempted from all or part of the requirement, though an exemption may be granted only in response to a written request. The Commission has held several Statewide local government ethics seminars since 1979. It is likely that the next seminar will be held in 2000. The Commission also received and reviewed reports from Prince George's County and Montgomery County regarding special land use ethics reports required in those jurisdictions.

An annual listing of local governments having ethics laws is to be published in the *Maryland Register* and included with the Commission regulations in COMAR 19A.04 and 19A.05.

Educational and Informational Activities

The Commission staff has been active in providing information to those covered by the Ethics Law, as well as other persons interested in its requirements. A substantial daily staff workload has involved advising employees, officials, candidates and lobbyists on how to complete forms, and providing informal advice regarding possible conflicts of interest. The Commission staff has assisted local government and school board officials in drafting their ethics laws and regulations. The staff has also provided technical advice to local government ethics boards. Presentations were made by the staff to various groups covered by the Law or interested in the operation of the Law. Numerous formal briefings and training programs were made to groups of employees, officials, or lobbyists on the requirements of the Law. Employees of several agencies or departments received special briefings. New legislation passed in 1999 requires new financial disclosure filers to receive 2 hours of Ethics Law

training. The Commission developed plans in late 1999 to implement this mandate. The annual lobbyist briefing was provided in Annapolis. Presentations were also made to other groups interested in the operation of the lobbying law. Part of this activity included presentations to students and international visitors.

Part of the Commission's public information activity involves distribution of lists of registered lobbyists and provision of assistance to persons inspecting various forms filed with the Commission. Pamphlets describing the Ethics Law have been made available to management level employees in State agencies. Another pamphlet covering ethics requirements for part-time members of State boards and commissions is also being distributed on a limited basis. Fiscal limitations have essentially reduced the ability to develop new printed materials. The Commission's staff does distribute, through interagency mail, a special two-page summary of ethics requirements to State agency managers. Special memos regarding the impact of the ethics law on gifts, procurement, post-employment, employment, and on political activity are also distributed. Also, memos on lobbying laws relating to private colleges, lobbyist political activity, and a memo regarding adjustments to the procurement ethics provisions were distributed. A special memo to advise potential new members of boards and commissions of the impact of the Ethics Law has also been developed.

A home page on the Internet was maintained. The home page includes a program summary, a lobbyist list and related data, the Annual Report, special explanatory memos, and a bi-monthly bulletin. Also included are copies of lobbying and financial disclosure forms and the ability to access these forms. A new feature of this site, established in 1999, is the provision of a list of State vendors that can be queried by agency or vendor. Another new feature is an ethics question of the month which answers hypothetical questions based on past Commission opinions. The Internet provides a cost effective mechanism for providing ethics information and training to those covered by the Ethics Law and public access to ethics information. The volume of persons using this website has been steadily growing. The staff is also very frequently involved in assisting the public and press in inspecting public records of lobbyists and officials and providing access to other ethics law information in media appearances or other means.

LEGISLATIVE RECOMMENDATIONS

In 1999, the General Assembly passed a substantial amount of ethics legislation. Most of this legislation related to the members of the General Assembly, gifts, lobbyists and the Joint Committee on Legislative Ethics. Three bills implemented recommendations of the State Ethics Commission. One of these bills extended the misuse of prestige of office provisions to State elected officials. Another enacted law was a bill proposed by the State Ethics Commission requiring mandatory ethics training for new financial disclosure filers. A third bill strengthened ethics provisions relating to non-participation, secondary employment, gifts and spouse interest in procurement situations.

A bill only impacting on Harford County places ethics jurisdiction over the County liquor board and its employees with the State Ethics Commission.

The General Assembly also passed a resolution calling for a study of the standards of conduct of lobbyists.

The Commission continues to review the adequacy of the Public Ethics Law as required by the statute. The recommendation listed below was specifically suggested for departmental legislation in 1999. (This bill has been introduced as departmental legislation.)

Financial Disclosure - County Election Board Administrators

The Ethics Law has two specific standards determined whether an employee is to be designated as an office required to file annual financial disclosure statements. The first standard requires an employee to be a Grade 16 or equivalent and to have substantial tasks defined in the law within the agency or if below Grade 16, to have some significant continuing role in larger procurement contracts. In the past, only about half of county election board chief administrators have been determined to meet these criteria primarily because of the low salary of these administrators.

The State Ethics Commission believes these administrators are in very significant and sensitive positions requiring the utmost disclosure and oversight. Therefore, the Commission recommends the law should specifically require public annual financial disclosure for all of these administrators.

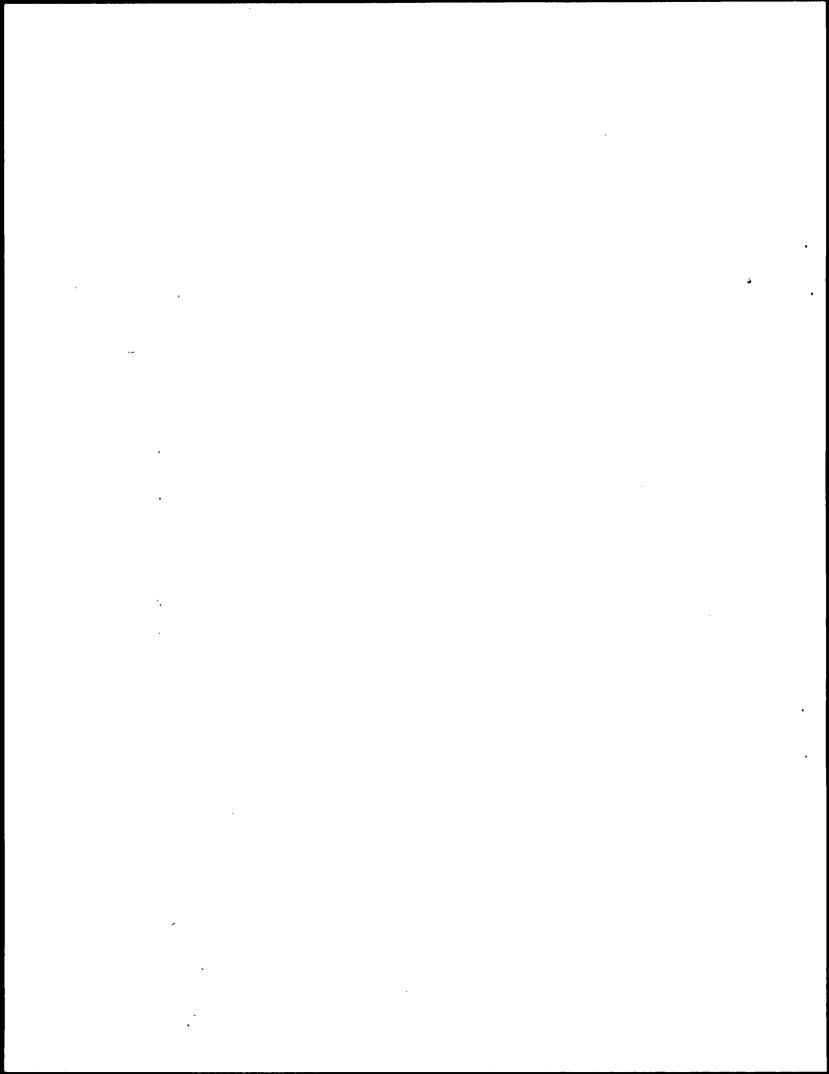
ADDITIONAL LEGISLATIVE RECOMMENDATIONS

- The Law should be formally amended to more specifically reflect advice by the Commission and the Attorney General regarding testimonial fund raising by employees and officials, which is fully covered by the Ethics and Elections Law.
- The Election Law provisions dealing with contested elections do not clearly deal with these matters leaving potential questions about the solicitation, acceptance, and disclosure of these funds. Election Law should be amended to clearly establish limits and disclosure of this activity as part of the election function and not as gift activity.
- There is a need to consider granting the Commission at least minimal fining authority in ethics and lobbyist matters in order to provide a formal alternative to expensive court proceedings.
- The current Law does not seem to always clearly deal with gifts from foreign governments. There is a need to review the issue and clarify the Law.
- The post-employment provisions of the Ethics Law should be reviewed and revised in order to avoid abuses that can occur under the technical language of the current law. This review should focus on higher level management positions.
- The Ethics Law prohibits certain types of representation before State agencies. However, except for special legislative disclosure, there is no specific required disclosure of representation before State agencies. It is recommended that officials who appear before State agencies for compensation include on their annual disclosure form at a minimum the identity of any agencies involved in this compensated representation.
- The Commission has been presented with several situations where high State officials have been invited to serve on the board of directors of private corporations having sensitive business or regulatory involvement with the State. The existing Ethics Law provisions are not well designed to effectively control the conflicts that can be caused by such affiliations. It is recommended that membership by high officials on the boards of these types of corporations be controlled more specifically in the Ethics Law.
- Issues regarding the spouses of employees or officials have arisen in Maryland and on a national basis. The Maryland Public Ethics Law does not consistently and clearly address

these issues or provide sufficient policy guidance in these matters. Spouse ethics issues have become more prevalent in part as a reflection of both spouses having careers and other economic relationships. For example, the Law does not always clearly deal with gift disclosure situations that may occur in these situations.

- The Commission receives many questions from agencies and others concerning issues involving State related foundations. Some of these questions relate clearly to the Ethics Law and can be resolved by the Commission. Many of these questions involve fiscal and general policy issues unrelated or only indirectly related to the Ethics Law. It is not possible for the Commission to determine appropriate policy in these areas. Any control mechanisms that need to be established to reach these concerns should be established by the Executive and Legislative branches of government as part of ongoing policy development.
- Consideration should be given to having new officials file a financial disclosure statement covering their holdings as of the time when they come into their position rather than for the previous calendar year.
- The law should be amended to expressly state that Deputy Sheriffs and other Sheriffs' Office employees other than the elected Sheriff are also covered by local ethics laws consistent with the Commission's advisory opinion on this topic. Issues have also been raised whether local authority is sufficient to cover assistant State's Attorneys and other office staff. Although local laws generally do cover these situations, there may be a need to make this local authority and requirement more clear.
- In the 1999 Session of the General Assembly, the Harford County Liquor Board and its employees were placed under the authority of the State Ethics Commission. However, the employees of the Board, regardless of salary or duties, were excluded from financial disclosure requirements. This exclusion is unprecedented in any other agency or board and should be changed to make the disclosure requirements for these employees the same as other employees subject to the State Ethics Law.
- The need for disclosure of interests in mutual funds should be reviewed to determine if this information is fully necessary to accomplish the purposes of the Law.
- The provisions of §15-608 regarding attributable interests should be studied with the idea of reducing the burden caused by the disclosure requirements when a person has a small share in a large diverse testamentary trust.
- Judicial candidates should be required to file financial disclosure in each year of their candidacy in the same way as other candidates for State office.
- In election years improperly filed candidate's disclosure forms create unique enforcement problems. Before a violation can be found and made public a variety of confidential administrative and adjudicatory processes have to occur. In most cases this process would extend well beyond the primary election and probably beyond the general election. This means that serious completion problems or even false disclosure could exist unknown to the voting public. A very large percentage of non-incumbent candidates have substantial financial disclosure statement completion problems. A review should be made by the Executive and the General Assembly to determine whether confidentiality should be eliminated for candidate's financial disclosure enforcement cases at an earlier point in the enforcement process.

- Some consideration should be given to removing the current language dealing with Commission review of forms in §15-205(a)(5), and substituting a provision for review consistent with standards to be established by the Commission.
- In order to avoid uncertain and confusing application and administration of the Law, the special provisions of §15-807 making members of State boards funded in whole or in part by Baltimore County subject to the county disclosure law instead of the State Law should be considered for elimination, or at a minimum copies of these forms should be filed with the State Ethics Commission.
- The bi-county agency ethics regulations requirements as to employees of these agencies should be reviewed to make sure that sufficient penalty provisions are provided and that the current ethics regulations of the agencies meet the intent of the Law.
- The provisions for confidentiality in the Ethics Law should be reviewed to determine if they adequately protect privacy without denying needed information to operations agencies or the public.
- There has been an increase in issues regarding potential conflicts of interests involving persons appointed to State boards and commissions. In part, it has been caused by minor short term advisory boards being more frequently created by statute in recent years instead of being created by Executive Order not having the force of law or legislative resolution. Boards created by law are covered by the Ethics Law. A related problem is many new boards are being created with appointments criteria mandating a significant conflict of interest. It is recommended that where minor short-term advisory boards are created, they not be established by law and where statutory boards are created more care be exercised in avoiding mandatory major conflicts of interests in appointment requirements. Generally, lobbyists should not be appointed to boards that have duties relating to their lobbying activities. These types of appointments make violations of the law while on the board or post service almost unavoidable.
- An amendment was proposed to the Ethics Law in the 1999 Session of the General Assembly to require State vendors to disclose economic relationships which may conflict with the duties undertaken on behalf of the State. The Commission was asked to review this proposal. The Commission recommends that a vendor disclosure program be developed but this program be more limited than originally proposed and that the disclosure aspects be part of the procurement law.
- The Commission has noted that consultants have been hired sometimes for a contingent fee to assist business entities to get grants, loans and other financial benefits from the State. In the absence of gift activity, these consultants often fall outside the lobbyist registration requirements. The State now requires lobbyist registration and contingent fee bar where such consultants attempt to influence procurement of \$100,000 or more. The Commission recommends that where these types of consultants attempt to influence substantial State incentives to business entities lobbying registration be required and contingent fees be barred.
- The law prohibiting misuse of confidential information should be extended to cover former officials and employees as to confidential information acquired during their State service.
- If the Injured Worker's Insurance Fund is to continue as a State entity then its board members and employees should continue to be covered by the State Ethics Law.



APPENDIX A

EMPLOYER SPENDING \$25,000 OR MORE - ALL REGISTRANTS ALL TYPES OF EXPENSES

November 1, 1998 - October 31, 1999

TOTAL AMOUNT		L AMOUNT	<u>EMPLOYER</u>
1.	1	,306,699.99	Baltimore Gas & Electric Company
2.		446,668.67	Potomac Electric Power Company
3.	*	339,156.00	Maryland Chamber of Commerce
4.	*	253,546.63	Maryland Retail Merchants Association
5.		248,454.00	MEDCHI, The Maryland State Medical Society
6.	*	246,496.75	Maryland State Teachers Association
7.	*	234,935.68	Bell Atlantic-Maryland, Inc.
8.	*	234,632.37	Cable Telecommunications of MD, DE, & DC
9.		217,721.35	A T & T
10.	*	208,042.39	Laurel Racing Association, Inc.
11.	*	208,041.63	Maryland Jockey Club/Pimlico Race Track
12.	*	193,953.89	Maryland Assn. of Health Maintenance Organizations, Inc.
13.	*	193,053.65	Glaxo Wellcome Inc.
14.		190,881.97	Maryland Classified Employees Association
15.	*	180,955.05	Maryland Bankers Association, Inc.
16.		176,687.43	Maryland Highway Contractors Association
17.		174,778.00	Maryland Hospital Association
18.		167,180.89	CareFirst Blue Cross & Blue Shield of Maryland
19.		163,650.00	Marylanders for Sensible Electricity Reform
20.	*	159,354.13	Maryland Association of Realtors, Inc.
21.		149,188.64	Allegheny Energy
22.	*	141,065.00	Maryland State Bar Association
23.		140,000.00	League of Life and Health Insurers of Maryland
24.	*	137,344.54	Association of Maryland Pilots
25	*	124,028.32	Medstar Health
26.		121,836.65	CONECTIV
27.		119,241.67	Marylander's for Efficient and Safe Highways
28.	*	118,641.30	Rite Aid Corporation
29.		116,729.00	Maryland Industrial Group

30.		114,085.70	Philip Morris Management Corporation
31.	*	112,970.60	MARTA Technologies
32.		105,234.25	American International Water Service Company
33.		104,460.55	Automated Wagering, Inc.
33. 34.		100,482.25	Health Facilities Association of Maryland
3 4 .		100,482.23	Pro Football, Inc. (The Redskins)
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36.	*	99,000.00	Maryland Trial Lawyers Association
37.	*	98,729.50	Enron Energy Sevices, Inc.
38.	*	98,183.93	Lockheed IMS Corporation
39.	*	94,066.37	Atlantic Richfield Company (ARCO)
40.		93,204.06	MAMSI (Mid-Atlantic Medical Services, Inc.)
41.		92,235.00	St. Agnes Health Care
42.		90,000.00	Buck Distributing Company
43.		87,808.60	Southern Maryland Electric Cooperative, Inc.
44.	*	83,749.59	Law Offices of Peter Angelos
45.		83,323.16	American Cancer Society, MD Division
46.		82,399.00	Johns Hopkins University
47.		82,265.15	Apartment & Office Bldg.Assn.of Metro Washington
48.	*	81,941.22	Baltimore Ravens, Inc.
49.		80,981.60	Medical Mutual Liability Insurance Company
50.		80,475.00	Washington Gas, Maryland Division
51.		80,322.24	Adventist Health Care
52.		80,184.57	American Petroleum Institute
53.		80,174.01	Chemical Industry Council of Maryland
54.		78,339.74	Maryland Optometric Association
55.		76,886.01	Maryland Builders Association
56		76,546.32	UST Public Affairs, Inc.
57.		76,148.67	St. Joseph Medical Center
58.	*	74,669.80	Schaller Anderson of Maryland, LLC
59.		74,579.04	Norfolk Southern Corporation
60.	*	72,583.92	Johns Hopkins Medicine
61.		70,982.65	Nationwide Insurance Enterprises
62.		69,976.00	Common Cause/Maryland
63.		69,626.66	National Federation of Independent Businesses
64.		68,291.73	Baltimore Jewish Council
65.		68,008.14	Maryland State & D.C. AFL-CIO
66.		67,787.58	Choptank Electric Cooperative, Inc.

67.		66,638.50	Maryland Tort Reform Coalition
68.		66,396.30	Maryland State Dental Association
69.	*	66,042.68	Circuit City Stores, Inc.
70.		65,983.22	Nextel Communications
71.		65,336.40	Restaurant Association of Maryland, Inc.
72.	*	65,147.95	MCI WorldCom
73.	*	64,817.11	Variable Annuity Life Insurance Co. (VALIC)
74.		64,785.70	Alzheimer's Disease & Related Disorders Assn. Inc.
75.	*	64,702.32	Old Dominion Electric Cooperative
76.		63,273.40	Delmarva Poultry Industry
77.		62,646.04	Suburban Hospital
78.		62,428.39	Sverdrup
79.		62,175.02	SCI Atlantic Region
80.	*	61,238.85	Information Systems & Network Corporation
81.	*	60,479.81	Magellan Health Services
82.		60,343.72	Cloverleaf Enterprises
83.		60,316.84	Bethlehem Steel Corporation
84.		60,205.43	University of Phoenix
85.		59,474.48	Maryland Farm Bureau, Inc.
86.		59,429.49	EPIC Pharmacies - Maryland
87.		59,426.00	Anheuser-Busch Companies
88.		59,406.19	American Heart Association
89.		58,739.59	Greenbelt Metropark, L.L.C.
90.		58,709.09	American Insurance Association
91.		58,114.04	Fraternal Order of Police, Maryland State Lodge
92.	*	58,049.00	Maryland Independent College and University Association
93.		57,746.54	Merck & Company, Inc.
94.	*	57,617.75	Anderson Consulting LLP
95.		57,550.00	Crown Central Petroleum Corporation
96.		57,465.91	General Motors Corporation
97.		57,007.88	R.J. Reynolds Tobacco Company
98.		56,886.17	Maryland Children's Initiative, Inc.
99.		56,779.22	Maryland New Car and Truck Dealers Assn.
100.	*	56,748.25	Washington Area New Automobile Dealers Assn.(WANADA)
101.		56,299.68	Stavrou Senior Communities LLC
102.		56,000.00	Maryland Association of Mutual Insurance Companies
103.	*	55,858.88	Greater Baltimore Medical Center

104.		55,176.00	Maryland Association of Non-Profit Organizations
105.		55,104.06	Bally's Maryland, Inc.
106.		55,000.00	Maryland Association of Mortgage Brokers
107.		54,775.00	Alcoa Eastalco Works
108.		53,708.19	Commission-Net Development Group
109.		53,328.85	Wheelabrator Water Technologies, Inc./BioGro
110.		52,000.00	Lockheed Martin Technology Services Group
111.		51,290.19	Maryland Association of Tobacco & Candy
112.	*	51,107.77	National Smokers Alliance
113.		50,742.00	Maryland Catholic Conference
114.		50,263.85	Pharmaceutical Research & Manufacturers of America
115.		50,194.92	Quest Diagnostics
116.		50,000.00	TFWS,Inc.
117.		49,980.00	Amerigroup Corporation
118.	*	49,451.91	Maryland Society of Anesthesiologists
119.		48,792.42	Citizens Against Open Bay Dumping
120.	*	48,696.09	Maryland Association of Chain Drug Stores
121.	*	48,272.84	Lifebridge Health
122.		48,083.52	National Association of Independent Insurers
123.		47,971.31	Advocates for Children & Youth, Inc.
124.		47,469.00	Mid-Atlantic Non-Profit Health & Housing Assn.
125.	*	46,852.76	Cloverleaf Standardbred Owners Assn.
126.		46,607.35	Coca-Cola Enterprises - Northeast
127.		46,200.00	Maryland Insurance Council
128.	*	46,146.35	Maryland Wholesale Distributors Coalition
129.		46,040.93	Tudor Farms, Inc.
130.	*	45,333.19	Allegany Racing L.L.C.
131.		45,000.00	Westvaco Corporation
132.		45,000.00	Owens Corning
133.		44,685.44	CSX Transportation
134.		44,560.00	MD/DC/DE Broadcasters Association, Inc.
135.	*	44,456.72	Chimes, The
136.		44,345.11	AFT Maryland
137.	*	44,322.40	HCR Manor Care
138.		44,221.75	Household Financial Group, Ltd.
139.		44,000.00	Oracle Corporation
140.		43,806.87	Associated Builders and Contractors of Metro Washington

141.	*	43,516.42	Progressive Insurance Company
142.		43,055.00	Mothers Against Drunk Driving
143.		43,000.00	Washington Metropolitan Transit Authority
144.		42,472.38	Planned Parenthood of Maryland
145.		42,386.05	Trigen-Baltimore Energy Corporation
146.		42,000.00	Fountainhead Title Group, The
147.		42,000.00	DuPont Pharmaceuticals
148.		42,000.00	ATC Logistics, Inc.
149.	*	41,876.16	Maryland Citizens for the Arts
150.		41,409.49	Johnson Controls, Inc.
151.		40,747.89	Children's National Medical Center
152.	*	40,602.00	Mid-Atlantic Power Supply Assn.
153.		40,500.00	Community Education Centers
154.	*	40,455.66	Peninsula Regional Medical Center
155.		40,397.20	General Public Utilities Companies
156.		40,250.87	Southern Maryland Agricultural Association, Inc.
157.		40,040.00	Blind Industries & Services of Maryland
158.		40,030.85	CIGNA Corporation
159.		40,000.00	Resource Management, Inc.
160.		39,944.24	Maryland State & DC Professional Firefighters Assn.
161.		39,596.00	Sun Company, Inc.
162.		38,937.76	WMDA Service Station & Automotive Repair Assn.
163.		38,394.19	Golden Rule Insurance Company
164.		38,154.06	Kraft Foods, Inc.
165.		38,000.00	Eli Lilly & Company
166.		37,996.00	Maryland Works, Inc.
167.		37,520.23	Winstar Wireless, Inc.
168.		37,388.98	State Farm Insurance Companies (IL)
169.		37,236.93	Brown & Williamson Tobacco Corporation
170.		37,125.46	Fairfax County Water Authority
171.		37,122.00	Maryland Tourism Council
172.		37,082.00	American Academy of Pediatrics, Maryland Chapter
173.		37,000.00	Cigar Association of America, Inc.
174.	*	36,957.61	Maryland Motor Truck Association
175.		36,884.02	State Farm Mutual Automobile Insurance Company
176.		36,841.00	Evangelical Lutheran Church in America/DEL-MD Synod
177.		36,683.81	Greater Baltimore Committee

178.		36,524.40	Motorola, Inc.
179.		36,500.00	NationsBank
180.		36,268.00	FMC Corporation
181.		36,250.65	Copeland Associates, Inc.
182.		36,243.11	NeighborCare Pharmacies
183.		36,052.58	Lorillard Tobacco Company
184.		36,000.00	Prince George's County Public Schools
185.		35,750.00	National Association of Industrial & Office Parks
186.		35,750.00	KOBA Institute
187.		35,750.00	Credit Union Insurance Corporation
188.		35,675.33	Prince George's Chamber of Commerce
189.		35,498.00	Kawasaki Rail Car, Inc.
190.		35,310.03	Center for Poverty Solutions
191.	*	35,236.94	Maryland Society American Institute of Architects, Inc.
192.		35,026.32	Parsons Corporation
193.		35,000.00	Maryland Rental Car Coalition
194.		34,807.00	Northrup Grumman Corporation
195.		34,465.00	Frederick R. Harris, Inc.
196.		34,452.00	AFSCME Council 92
197.		34,311.00	Mental Health Association of Maryland
198.		34,259.73	Warner-Lambert Company
199.		34,080.50	National Association of Social Workers, MD Chapter
200.	*	33,901.00	Greater Washington Board of Trade
201.		33,865.00	Maryland State Funeral Directors Association
202.		33,583.79	Health Insurance Association of America
203.		33,575.28	Maryland Chiropractic Association
204.		33,534.72	Southland Corporation
205.		33,441.81	Maryland Association of Community Colleges
206.		33,138.75	Marine Trades Association of Maryland
207.		33,000.00	Maryland Credit Union League
208.	*	32,890.24	Culver Associates
209.	*	32,840.26	American Capital Access Service Corporation
210.		32,632.00	Teachers Insurance & Annuity Association
211.		32,562.04	American Physical Therapy Association of Maryland
212.		32,500.00	Montgomery County Office of Intergovernment Relations
213.		32,378.27	Peoplesoft USA, Inc.
214.		32,196.71	Benova, Inc.

215.		32,000.00	United Medical Management, Inc.
216.		31,972.96	Washington/Baltimore Cellular Limited Partnership
217.	*	31,609.18	MITRETEK Systems, Inc.
218.		31,513.95	Capital Asset Research Corporation
219.		31,500.00	Maryland State Licensed Beverage Assn.
220.		31,268.02	Anne Arundel County Association of Realtors, Inc.
221.		31,266.91	Phillips Foods, Inc.
222.		31,070.49	Association of Northern Chesapeake Docking Pilots
223.		30,906.12	MD/DC/DE Press Association
224.	*	30,593.17	National Association of Optometrists & Opticians
225.		30,466.57	BHMA, LLC
226.		30,255.99	Eller/Adshell, Inc.
227.		30,066.60	Professional Insurance Agents Association of PA, MD & DE
228.		30,025.00	Maryland Association of Resources for Families & Youth
229.		30,000.00	USA Waste Services, Inc.
230.		30,000.00	United State Gypsum Company
231.		30,000.00	Smokeless Tobacco Council
232.		30,000.00	Owens Illinois, Inc.
233.		30,000.00	Jerome J. Parks
234.		29,800.69	Maryland Psychological Association
235.	*	29,456.00	Maryland Psychiatric Society, Inc.
236.		29,385.63	AAA Mid-Atlantic and AAA Potomac
237.		29,020.00	Maryland Burglar & Fire Alarm Association
238.		28,909.49	Maryland Alliance for Fair Competition
239.		28,509.24	MD/DC/DE Soft Drink Association
240.		28,490.76	Prince George's County Association of Realtors
241.		28,470.00	Maryland Association of Certified Public Accountants
242.		28,306.51	Melwood Horticultural Training Center, Inc.
243.		28,244.45	National Rifle Association Institute for Legislative Action
244.		28,000.00	Prince George's County Planning Board
245.		27,944.17	Dimensions Healthcare System
246.		27,839.40	American College of Emergency Physicians
247.		27,695.00	Motion Picture Association of America
248.		27,500.00	RPG Profile America of Maryland, Inc.
249.		27,471.03	Environmental Defense Fund
250.		27,465.18	St. Agnes Hospital
251.		27,410.53	USL Financial, Inc.
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252.		27,280.00	Maryland Assisted Living Association (MALA)
253.		27,239.90	Mettiki Coal Corporation
254.		27,218.85	Kennedy Kreiger Institute
255.		27,068.92	Marriott International Inc.
256.		27,040.00	CCRC Coalition
257.		26,877.21	Maryland State Association of Life Underwriters
258.		26,700.00	Recording for the Blind & Dyslexic
259.	*	26,532.31	Maryland Association of Green Industries
260.		26,513.20	Howard University
261.		26,266.50	Maryland Association of Boards of Education
262.		25,850.22	State Law Enforcement Officers Labor Alliance
263.		25,788.00	Maryland Cab Association
264.		25,704.06	AutoNation, Inc.
265.		25,508.00	Maryland Aggregates Association, Inc.
266.	*	25,382.22	Lucent Technologies, Inc.
267.		25,366.11	Mid-Atlantic Financial Services Association
268.		25,065.00	Maryland Agriculture Council, Inc.
269.		25,000.00	United Healthcare of the Mid-Atlantic
270.		25,000.00	Peachtree Settlement Funding
271.		25,000.00	Miller Brewing Company
272.		25,000.00	EIA/NSWMA
273.		25,000.00	Aetna US Healthcare, Inc.

^{*} Those who filed gift reports.

APPENDIX B

LOBBYISTS RECEIVING \$50,000 OR MORE IN COMPENSATION ONE OR MORE EMPLOYERS

November 1, 1998 - October 31, 1999

1.	\$1,043,399.90	Evans, Gerard E.
2.	832,870.39	Alexander, Gary R.
3.	820,587.38	Rifkin, Alan M.
4.	533,814.25	Stierhoff, John R.
5.	464,054.96	Rasmussen, Dennis
6.	400,789.00	Rozner, Joel D.
7.	387,806.00	Pitcher, J. William
8.	369,698.06	Johansen, Michael V.
9.	353,527.00	Enten, D. Robert
10.	345,243.80	Schwartz, Joseph A.,III
11.	331,101.50	McCoy, Dennis C.
12.	297,120.00	Bereano, Bruce C.
13.	253,469.58	Cooke, Ira C.
14.	250,554.60	Tiburzi, Paul A.
15.	238,500.00	Gisriel, Michael U.
16 .	233,870.40	Shaivitz, Robin F.
17.	229,566.27	Doyle, James J., Jr.
18.	215,833.55	Popham, Bryson
19 .	210,702.58	Goldstein, Franklin
20 .	195,962.50	Levitan, Laurence
21 .	189,507.00	Burridge, Carolyn T.
22 .	186,910.68	Rivkin, Deborah R.
23	177,000.00	Arrington, Michael
24 .	161,533.14	Doherty, Daniel T. Jr.
25 .	153,975.14	Lighthizer, O James
26 .	152,934.38	Adler, Maxine
27	141,920.00	White, Peter B.
28 .	136,500.00	Canning, Michael F.
29 .	135,729.04	O'Dell, Wayne

30 .	132,750.00	Neil, John B.
31.	125,587.50	Goeden, James P.
32 .	125,000.00	Wagner (Crook) Jenifer, M.
33 .	124,605.17	Burns, Kimberly M.
34 .	121,730.98	Kasemeyer Pamela Metz
35 .	115,321.69	Wayson, Edward O. Jr.
36 .	115,000.00	Carter, W. Minor
37.	109,557.21	Powell, Michael C.
38.	109,000.00	Pica, John A. Jr.
39 .	107,999.90	Gruber, Victoria
40 .	107,637.48	Freedman, Chantel
41 .	106,106.10	McDonough, John P.
42 .	102,771.82	Brocato, Barbara Marx
43.	102,720.00	Lanier, Ivan
44 .	102,058.00	Winchester, Albert III
45 .	101,800.00	Neily, Alice J.
46 .	90,000.00	Behney, Elizabeth Buck
47 .	83,583.34	Manis, George N.
48 .	80,000.00	Lattanzi, E. Thomas
49 .	79,720.23	Doolan, Devin John
50 .	78,929.82	Sheehan, Lorraine M.
51.	75,650.00	Buckingham, Stephen C.
52.	74,183.33	Manis, Nicholas G.
53.	72,000.00	Baker, Ross L.
54.	69,257.03	Collins, Carville B.
55 .	66,666.67	Eastridge, Robert W.
56 .	66,034.00	Latham, Robert E.
57.	63,000.00	Shaw, Carolyn R.
58 .	61,500.00	Valentino-Benitez, Ellen
59 .	60,904.96	Saquella, Thomas S.
60 .	60,106.00	Silver, Edgar P.
61 .	59,485.00	Bell, Kevin
62 .	59,160.00	Hoover, Lesa N.
63 .	58,925.00	Weisengoff, Paul
64 .	57,600.00	Costello, Christopher B.
65 .	•	Johnson, Deron A.
66 .	55,322.00	Kronk, Annie K.

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	67 .	55,298.36	Gunther, Robert	
	68 .	54,963.50	Miedusiewski, American Joe	
	69 .	54,375.00	Robbins, Earl H. Jr.	
	70 .	53,950.00	Doherty, Frances	
	71 .	53,521.25	Saquella (Vincent), Diana K.	
	72 .	52,711.00	Harting, Marta D.	
-	73 .	52,351.00	Wyatt, Joseph Richard	
,	74 .	52,053.06	Stone, Thomas B., Jr.	۷
•	75 .	51,837.34	Neville, Mary Jo	-
!	76 .	51,000.00	Wyatt, Maurice R.	
	77	50,739.59	Stebbins, Dana B.	
	78 .	50,000.00	Townsend, Pegeen	
	79 .	50,000.00	Sammis, Elizabeth	

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APPENDIX C

EXPENDITURES ON SPECIAL EVENTS November 1, 1998 - October 31, 1999

Group	Number of	
<u>Invited</u>	Times Invited	<u>Total</u>
All Consul Assessible	F 4	ÅE 40 004 0E
All General Assembly	54	\$548,904.85
Senate only	0	0
House only	0	0
Anne Arundel County Delegation	2 7	383.42
Baltimore City Delegation		5,920.73
Baltimore City Delegation (Senate only		900.77
Baltimore City Delegation (House only		1,046.40
Baltimore County Delegation	3	3,661.39
Baltimore County Delegation (Senate		1,688.10
Carroll County Delegation	2	345.86
Eastern Shore Delegations	5	1,698.19
Frederick County Delegation	1	200.00
Harford County Delegation	1	145.86
Howard County Delegation	3	1,826.37
Montgomery County Delegation	8	10,884.53
Prince George's County Delegation	4	12,803.57
Southern Maryland Delegation	1	241.32
Western Maryland Delegation	5	2,659.22
HOUSE		
Appropriations	6	5,955.83
Commerce & Governmental Matters	2	1,533.47
Economic Matters	17	16,008.73
Environmental Matters	17	17,048.21
Judiciary	8	9,641.77
Ways and Means	10	11,006.25
SENATE		
Budget and Taxation	9	7,098.73
Economic & Environmental Affairs	10	4,115.36
Finance	18	12,690.40
Judicial Proceedings	8	6,559.45

TOTAL: \$684,968.78

(NOTE: Where more than one committee was invited to the same event for the purposes of this report, there may be a proportionate allocation.)

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